

June 12, 2023

BY ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

*Application
GRANTED
SO ORDERED
Max M. Keefe
JSD
6-13-23*

Re: *United States v. Kenneth Wynder and Andrew Brown,*
S1 20 Cr. 470 (PKC)

Dear Judge Castel:

We write respectfully on behalf of defendant Andrew Brown, pursuant to Federal Rule of Criminal Procedure 45(b), to request a two-week extension of time to renew Mr. Brown's motion for a judgment of acquittal under Rule 29 and to make a motion for alternative relief under Rule 33. These motions are currently due June 13, 2023. [The Government consents to this request.]

The reason for this request is that a member of Mr. Brown's immediate family underwent a serious medical procedure last week. These circumstances have made us less able to liaise with Mr. Brown concerning the motions. We respectfully submit that these circumstances constitute good cause for an extension of time prior to the prescribed deadline. *See Fed. R. Crim. P. 45(b)(1)(A).*

Thank you for your consideration of this application.

Respectfully submitted,

/s/
Max Nicholas
Reed M. Keefe

Attorneys for Defendant Andrew Brown

cc: All Counsel (by ECF)